

**VAN HOVEN DECL.
ISO OPPOSITION TO INTUITIVE'S
MOTION TO REOPEN DISCOVERY**

EXHIBIT 14

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

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IN RE: DA VINCI SURGICAL Lead Case No.
ROBOT ANTITRUST LITIGATION, 3:21-cv-03825-VC
/
SURGICAL INSTRUMENT SERVICE
COMPANY, INC.,

Plaintiff,

vs. No. 3:31-cv-03496-VC

INTUITIVE SURGICAL, INC.,

Defendant.

_____/

(HIGHLY CONFIDENTIAL - ATTORNEY'S EYES ONLY)

VIDEOTAPED VIRTUAL VIDEOCONFERENCE

DEPOSITION OF SHARATHCHANDRA "SHARK" SOMAYAJI

November 4, 2022

Reported by: Kimberly L. Avery, CSR No. 5074

Job No. 5563382

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1 A. Yes.

2 Q. Do you have an understanding of what it
3 would be referring to to be hacking the chip you
4 use?

5 A. Yes. 14:48

6 Q. What's your understanding?

7 A. My understanding would be trying to break
8 into the RFID chip and the encryption.

9 End of the day, these are all encryptions.

10 So encryptions have a computer limit, 14:48

11 right? Like, there is processing power that's

12 needed, and you have to try combinations. And I

13 am thinking they are saying there's an opportunity

14 to hack into our RFID chip. Doesn't mean it's

15 done, but that's true for all cryptography, right? 14:48

16 Like, any encryption can be end of the day
17 broken.

18 Q. It's just a matter of computing power and
19 effort, right?

20 MS. CAHOY: Objection to form. 14:49

21 THE WITNESS: I would think so. Again,
22 not the subject matter that I'm aware of.

23 You should talk to Onur.

24 BY MR. VAN HOVEN:

25 Q. But that's your understanding, that it's a 14:49